



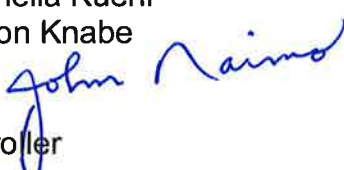
JOHN NAIMO  
AUDITOR-CONTROLLER

**COUNTY OF LOS ANGELES  
DEPARTMENT OF AUDITOR-CONTROLLER**

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December 3, 2014

TO: Supervisor Michael D. Antonovich, Mayor  
Supervisor Hilda L. Solis  
Supervisor Mark Ridley-Thomas  
Supervisor Sheila Kuehl  
Supervisor Don Knabe

FROM: John Naimo   
Auditor-Controller

SUBJECT: **TOBINWORLD – A DEPARTMENT OF MENTAL HEALTH SERVICE  
PROVIDER – PROGRAM REVIEW**

We completed a program review of Tobinworld (Tobinworld or Agency), which included a sample of billings from Fiscal Year (FY) 2013-14. The Department of Mental Health (DMH) contracts with Tobinworld to provide mental health services, including interviewing Program clients, assessing their mental health needs, and implementing treatment plans.

The purpose of our review was to determine whether Tobinworld provided the services and maintained proper documentation, as required by their County contract.

DMH paid Tobinworld approximately \$1.3 million on a cost-reimbursement basis for FY 2013-14. The Agency provides services in the Fifth Supervisorial District.

**Results of Review**

Tobinworld's staff had the required qualifications to provide DMH Program services, and the Agency maintained documentation to support the billings reviewed. However, Tobinworld did not establish specific or measurable goals for 11 (73%) of the 15 Client Care Plans reviewed, and did not document Informed Consent for two (29%) of the seven clients reviewed, prior to treatment with psychotropic medication.

*Tobinworld's attached response indicates that they provided training to their treatment staff, and implemented additional Quality Control procedures to ensure that the Client Care Plans and Informed Consent forms are properly documented.*

Details of our review, along with recommendations for corrective action, are attached.

### **Review of Report**

We discussed our report with Tobinworld and DMH. Tobinworld's attached response indicates that they agree with our findings and recommendations. DMH will work with Tobinworld to ensure that our recommendations are implemented.

We thank Tobinworld management and staff for their cooperation and assistance during our review. Please call me if you have any questions, or your staff may contact Don Chadwick at (213) 253-0301.

JN:AB:DC:EB:sk

### **Attachments**

c: Sachi A. Hamai, Interim Chief Executive Officer  
Dr. Marvin J. Southard, Director, Department of Mental Health  
Janet Tashman, Board Chair, Tobinworld  
Judy Weber, Executive Director, Tobinworld  
Public Information Office  
Audit Committee

**TOBINWORLD  
DEPARTMENT OF MENTAL HEALTH  
PROGRAM REVIEW  
FISCAL YEAR 2013-14**

**PROGRAM SERVICES**

**Objective**

Determine whether Tobinworld (Tobinworld or Agency) provided the services billed to the Department of Mental Health (DMH) in accordance with their contract and related guidelines.

**Verification**

We selected 40 (3%) of the 1,362 approved Medi-Cal billings for September and October 2013, which were the most current billings available at the time of our review (August 2014). We reviewed the Assessments, Client Care Plans, Progress Notes, and Informed Consent forms in the clients' charts for the selected billings. The 40 billings represent services provided to 15 clients.

**Results**

Tobinworld maintained documentation to support the billings reviewed. However, the Agency needs to improve the quality of documentation in their Client Care Plans and Informed Consent forms in accordance with their DMH contract requirements.

**Client Care Plans**

Tobinworld did not complete 11 (73%) of the 15 Client Care Plans in accordance with their DMH contract. Specifically, the Client Care Plans did not contain specific or measurable objectives as required by the DMH Provider's Manual, Chapter 1, Page 1-11. According to the DMH Provider's Manual, Client Care Plans should include clinical/case management objectives that are SMART (specific, measurable, achievable, relevant, and time-bound). We noted a similar finding during our prior monitoring review.

**Informed Consent**

Tobinworld did not document the Informed Consent as required by the DMH Provider's Manual, Chapter 2, Page 2-11, for two (29%) of the seven clients reviewed who received psychotropic medication. According to the DMH Provider's Manual, clients shall be treated with psychotropic medications only after they have been informed by the physician of their rights to accept or refuse such medication.

**Recommendations****Tobinworld management:**

1. **Ensure that Client Care Plans are completed in accordance with their Department of Mental Health contract.**
2. **Ensure that Informed Consent is documented in the client's chart prior to treatment with psychotropic medication.**

**STAFFING QUALIFICATIONS****Objective**

Determine whether Tobinworld treatment staff had the required qualifications to provide the mental health services.

**Verification**

We reviewed the California Board of Behavioral Sciences' website and/or the personnel files for ten (77%) of the 13 treatment staff who provided services to DMH clients during September and October 2013.

**Results**

Each employee reviewed had the qualifications required to provide the billed services.

**Recommendation**

**None.**



October 17, 2014

John Naimo  
Los Angeles County Dept of Auditor-Controller  
Auditor-Controller  
500 West Temple Street, Room 525  
Los Angeles, CA 90012-3873  
Regarding: **Tobinworld's Corrective Action Plan in Response to August 2014 Contract Compliance Review**

Dear Mr. Naimo,

Below you will find our corrective action plan in response to the Auditor Controller's Contract Compliance Review conducted in August of 2014.

#### **BILLED SERVICES**

##### Client Care Plans

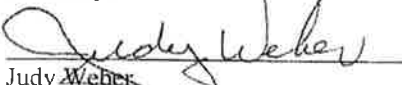
In April of 2014, our QA manager, as part of our QA program, identified that some clinicians (particularly our physicians) were not using SMART goals. Our QA manager has since met with both of our physicians and all staff who write treatment goals to provide additional training on Medical Necessity and SMART goals. In addition, the QA manager now reviews all care plans when they are written.

##### Informed Consent

In order to ensure accurate documentation of information consent we have taken two steps. First, we have set up our electronic records system so that for every note documenting medication support services, the physician will be asked whether new medication has been prescribed and if so, whether proper consent was obtained. The physician will not be able to submit a note until this is confirmed. In addition, our QA manager will regularly check to ensure proper consent has been documented.

Please do not hesitate to contact me if you need additional information.

Sincerely,

  
Judy Weber  
Executive Director